

Sarah Michelle Gilbert SGilbert@crowell.com (212) 895-4226 direct Crowell & Moring LLP 590 Madison Avenue 20th Floor New York, NY 10022 +1.212.223.4000 main +1.212.223.4134 fax

February 28, 2022

FILED ELECTRONICALLY BY ECF

The Honorable Paul G. Gardephe United States District Court Southern District of New York 40 Foley Square, Room 2204 New York, New York 10007

Re: Molly C. and Naomi L. v. Oxford Health Insurance, Inc., Case No. 1:21-cv-10144-PGG

Dear Judge Gardephe:

We represent Defendant Oxford Health Insurance, Inc. in the above-referenced action. Pursuant to Paragraph I(E) of Your Honor's Individual Rules of Practice, Defendant, jointly with Plaintiffs, respectfully requests an adjournment of the pretrial conference scheduled for March 10, 2022 at 10:00 AM (ECF No. 2) and the corresponding submission of the joint letter required to be filed seven days before the conference date.

Defendant filed a letter today requesting a pre-motion conference on its proposed motion to dismiss. The parties respectfully request an adjournment of the pretrial conference until after the Court issues a decision on the Defendant's motion to dismiss, in the event the Court grants Defendant leave to file it, or Defendant files an Answer.

Plaintiffs have consented to this joint request for an adjournment, which is requested in order to allow the parties to continue to engage in preliminary settlement discussions.

Thank you for your attention to this matter.

Memo Endorsed: In light of Defendant's anticipated motion to dismiss, the initial pre-trial conference scheduled for March 10, 2022 is adjourned sine die. The Court will address Defendant's request for a premotion conference (Dkt. No. 21) in a separate order after receiving Plaintiff's responsive letter.

Respectfully submitted,

s/ Sarah M. Gilbert
Sarah M. Gilbert

SO ORDERED.

Paul G. Gardephe

United States District Judge

Dated: March 3, 2022